

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
(Alexandria Division)

ASSOCIATED RECOVERY, LLC,	)	
	)	
<i>Plaintiff,</i>	)	
	)	
v.	)	Case No. 1:15-cv-01723-AJT-JFA
	)	
JOHN DOES 1-44,	)	
	)	
<i>Defendants in rem.</i>	)	

**DEFENDANT 744.COM'S MOTION TO SET ASIDE DEFAULT JUDGMENT AND  
RETURN DOMAIN NAME TO PRIOR OWNER**

*In rem* Defendant 744.com, pursuant to Federal Rule of Civil Procedure 60(b), hereby request to set aside the Judgment entered on May 18, 2016 [ECF 43]. Pursuant to Local Civil Rule 7(E), Defendant's counsel called Plaintiff's counsel to meet and confer in good faith regarding this Motion, and Plaintiff's counsel informed Defendant's counsel that she was unable to obtain authorization from the client regarding any aspect of this Motion.

The basis for this motion is set forth more fully in the accompanying Memorandum in Support of Defendant 744.com's Motion to Set Aside Default Judgment and Return Domain Name to Prior Owner.

WHEREFORE, Defendants respectfully request that the Court grant this Motion and set aside the Judgment entered on May 18, 2016, 2016 (ECF 43) with respect to the 744.com domain name. Defendant further requests that the Court further order Uniregistrar Corp., the current registrar of the 744.com domain name, to take all steps within its power to transfer the domain back to Hao Wang.

Dated: July 19, 2016

Respectfully submitted,

Of Counsel:

Steven M. Geiszler  
Zunxuan D. Chen  
Dentons US LLP  
2000 McKinney Avenue  
Suite 1900  
Dallas, TX 75201-1858  
214-259-0900 (phone)  
214-259-0910 (fax)  
steven.geiszler@dentons.com  
digger.chen@dentons.com

/s/ Eric Y. Wu

Lora A. Brzezynski, VSB No. 36151  
Claire M. Maddox, VSB No. 71230  
Eric Y. Wu, VSB No. 82829  
Dentons US LLP  
1900 K Street, NW  
Washington, DC 20006  
202-496-7500 (phone)  
202-496-7756 (fax)  
lora.brzezynski@dentons.com  
claire.maddox@dentons.com  
eric.wu@dentons.com

*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 19th day of July, 2016, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Rebecca J. Stempien Coyle (VSB 71483)  
Levy & Grandinetti  
Suite 304  
1120 Connecticut Ave., N.W.  
Washington, D.C. 20036  
(202) 429-4560  
Fax: (202) 429-4564  
mail@levygrandinetti.com

*Counsel for Associated Recovery, LLC*

Dated: July 19, 2016

/s/ Eric Y. Wu

Eric Y. Wu, VSB No. 82829  
Dentons US LLP  
1900 K Street, NW  
Washington, DC 20006  
202-496-7500 (phone)  
202-496-7756 (fax)  
eric.wu@dentons.com

*Counsel for Defendant*